

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE
IN ADMIRALTY**

MICHAEL ROBERTS,	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
v.	:	NO. 05-cv-0454 (GMS)
	:	
ALTAIR LINES, S.A.,	:	
	:	
Defendant/Third-Party Plaintiff,	:	
	:	
v.	:	
	:	
ACTIVE CRANE RENTALS, INC.,	:	
	:	
Third-Party Defendant.	:	
	:	
v.	:	
	:	
MURPHY MARINE SERVICES, INC., and	:	
MAGCO CRANE RENTALS,	:	
	:	
Fourth-Party Defendants.	:	

INITIAL DISCLOSURES

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FOR THE DISTRICT OF DELAWARE
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Plaintiff,	:	
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Defendant/Third-Party Plaintiff,	:	
	:	
v.	:	
	:	
ACTIVE CRANE RENTALS, INC.,	:	
	:	
Third-Party Defendant.	:	
	:	
v.	:	
	:	
MURPHY MARINE SERVICES, INC., and	:	
MAGCO CRANE RENTALS,	:	
	:	
Fourth-Party Defendants.	:	

**INITIAL DISCLOSURES OF
THIRD-PARTY DEFENDANT, ACTIVE CRANE RENTALS, INC.**

Defendant, Active Crane Rentals, inc. (hereinafter “Active Crane” or “Answering Defendant”), through its undersigned attorneys, Reger Rizzo Kavulich & Darnall, LLP, provides the following Initial Disclosures pursuant to the Federal Rules of Civil Procedure. These disclosures are based upon the information thus far available to defendant. Defendant respectfully reserves the right to add to, or amend this disclosure, as discovery and information continues.

A. Names of witnesses defendant may use to Support their defenses and/or fourth-party claims.

1. Steve Schmeusser, President, Active Crane Rentals, Inc., 103 Water Street, Newport, Wilmington, DE 19804. Mr. Schmeusser will testify regarding defendant's non-involvement with the alleged incident. Mr. Schmeusser will also testify regarding the rental agreement between Active Crane Rentals, Inc. and Murphy Marine Services, and the involvement of Fourth-Party Defendant, Magco Crane Rentals.

2. Officers and crew members who were serving aboard the M/V SHINANO REEFER on the date of the alleged incident (see crew list provided by counsel for Altair Lines, S.A). These officers and crew members could potentially have information concerning the activities aboard the vessel relating to the incident.

3. Employees of Plaintiff's employer Murphy Marine Services, Inc., could have information relating to the alleged accident in question, and information relating to the rental agreement between Active Crane Rentals, Inc. and Murphy Marine Services.

4. Representatives of defendant, Altair Lines, SA who may have knowledge concerning defendant's involvement with the alleged incident.

5. Representatives and employees of Fourth Party Defendant, Magco Crane Rentals, Inc., could have information relating to the alleged accident in question, and information relating to the operation of the crane allegedly involved in the alleged incident.

6. Representative(s) of various medical providers of plaintiff may have information regarding plaintiff's medical treatment and current condition.

B. Description of all documents, data, compilations, and tangible things in the possession or control of defendants that defendants may use to support their defenses.

1. Copy of the Rental Agreement between Murphy Marine Services and Answering Defendant. (Attached as Exhibit "A").

C. Insurance Information

Defendant, Active Crane Rentals, Inc. was insured at all times material hereto by Admiral Insurance Company, 1255 Caldwell Road, P.O. Box 5725, Cherry Hill, NJ 08034-3220.

REGER RIZZO KAVULICH & DARNALL, LLP

BY: /s/ Louis J. Rizzo, Jr.
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Attorney for Defendant,
Active Crane Rentals, Inc.

Date: July 28, 2006

Pro Hac Vice Counsel:

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of Defendant, Active Crane Rental's Initial Disclosures was serviced upon all counsel by first class mail, postage prepaid, on the date set forth below:

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(Attorney for Fourth-Party Defendant, Magco Crane Rentals)

REGER RIZZO KAVULICH & DARNALL, LLP

BY: /s/ Louis J. Rizzo, Jr.
Louis J. Rizzo, Jr., Esquire
Attorney for Defendant, Active Crane Rentals,
Inc.

Date: July 28, 2006